



**Environmental Conservation  
& Chemical Corporation  
Meeting of Potentially Responsible Parties  
April 13, 1983**

Enviro-Chem  
Meeting of Potentially Responsible Parties  
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Federal and State Participants

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AGENDA

ENVIRO-CHEM  
MEETING OF POTENTIALLY RESPONSIBLE PARTIES

- APRIL 13, 1983  
CHICAGO, ILLINOIS

9:30 a.m. - 10:00 a.m.	.....	Registration of Participants
10:00 - 10:15	.....	Introductory Remarks of U.S.EPA
10:15 - 10:30	.....	Introductory Remarks of the State of Indiana
10:30 - 11:15	.....	Overview of the site - Site description - Contaminants on and off-site - Superfund Response Actions to-date - Anticipated Superfund Actions
11:15 - 11:30	.....	Federal Legal Actions To-Date
11:30 - 12:noon	.....	Federal Settlement Position
12:00 - 1:15 p.m.	.....	Lunch
1:15 - 2:15	.....	Prepared Statements by Participants
2:15 - 3:15	.....	Questions and Answers
3:15 - 4:15	.....	Open Period for Discussions Among Generators
4:15 - 4:30	.....	Closing Remarks

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## I. SITE INFORMATION

### 1.1 - Site Description

Environmental Conservation and Chemical Corporation ("Enviro-Chem") is in Boone County, 865 south U.S. 421, Zionsville, Indiana, about 10 miles northwest of Indianapolis (Figure 1). The site occupies 6.5 acres within the 168 acre Northside Sanitary Landfill, an ongoing solid waste disposal facility permitted by the Indiana Stream Pollution Control Board (SPCB) (Figure 2).

The ECC facility is bounded on the south and east by the landfill. A site map is shown in Figure 2. An unnamed ditch separates the two facilities along the east boundary. The site is bounded on the north and west sides by several residential homes, located within one-half mile of the facility. The Eagle River Reservoir, a water supply reservoir for the City of Indianapolis, is in the same drainage basin as the site, approximately 10 miles to the south.

On the site are about 25,000 drums, 47 bulk storage tanks, a cooling water pond, a process building and main office. Some of the drums are bulging, leaking, or otherwise damaged. They are stacked three and four high on a concrete pad (south storage area) and on the ground (north storage area). An earthen dike surrounds the immediate processing and storage area. A combination wood and stranded wire fence surrounds the entire site.

### 1.2 - Site History

The Environmental Conservation and Chemical Corporation began operation in August of 1977. The company was engaged in the recovery/reclamation/brokering of primary solvents, oils and other wastes received from industrial clients. Waste products were received in drums and bulk tankers and prepared for subsequent reclamation or disposal. Reclamation processes included distillation, evaporation and fractionation to reclaim solvents and oil.

Two problems developed during the facility's operation:

- ° The inability of the company to adequately dispose of wastewater and contaminated stormwater generated at the facility,
- ° The inability of the company to manage its drum inventory in a manner that did not pose a threat to the environment.

On July 31, 1979, the Indiana State Board of Health (ISBH) received a report from a private citizen that an oil spill had occurred on Eagle Creek north of Zionsville. Immediate inspection revealed that the oil had originated from ECC and a minor amount from the Northside Sanitary Landfill. ECC agreed to take action to recover the oil. A followup investigation conducted on August 2, 1979, by the ISBH showed that ECC intentionally discharged process and cooling water from a storage lagoon into Finley Creek without a permit. ECC officials explained that due to heavy rains, stormwater pumped from the drum storage and loading areas to the cooling water pond caused it to overflow.

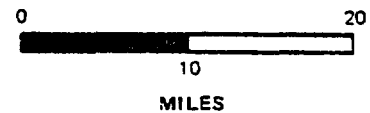
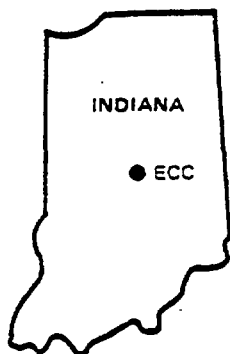
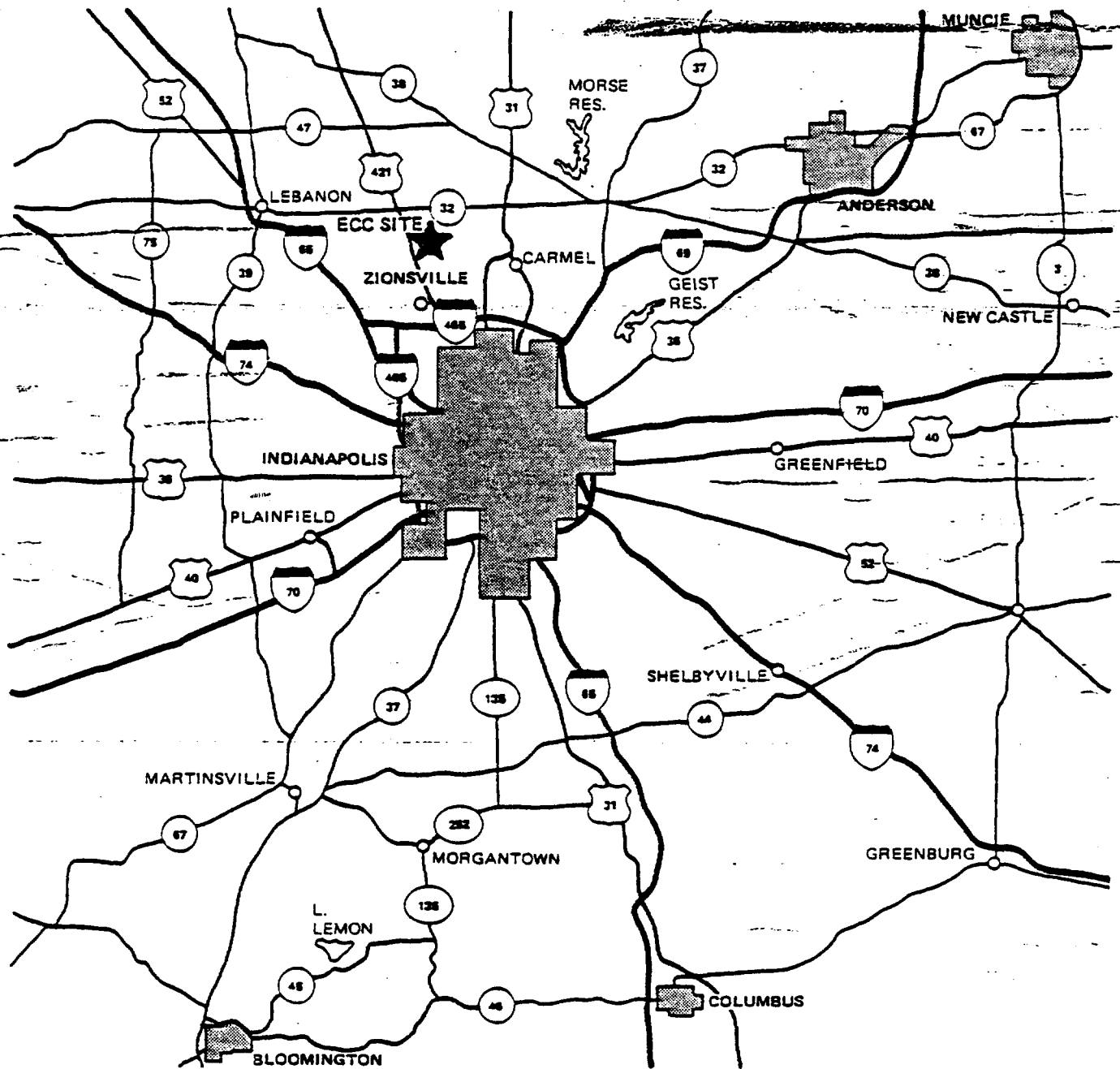
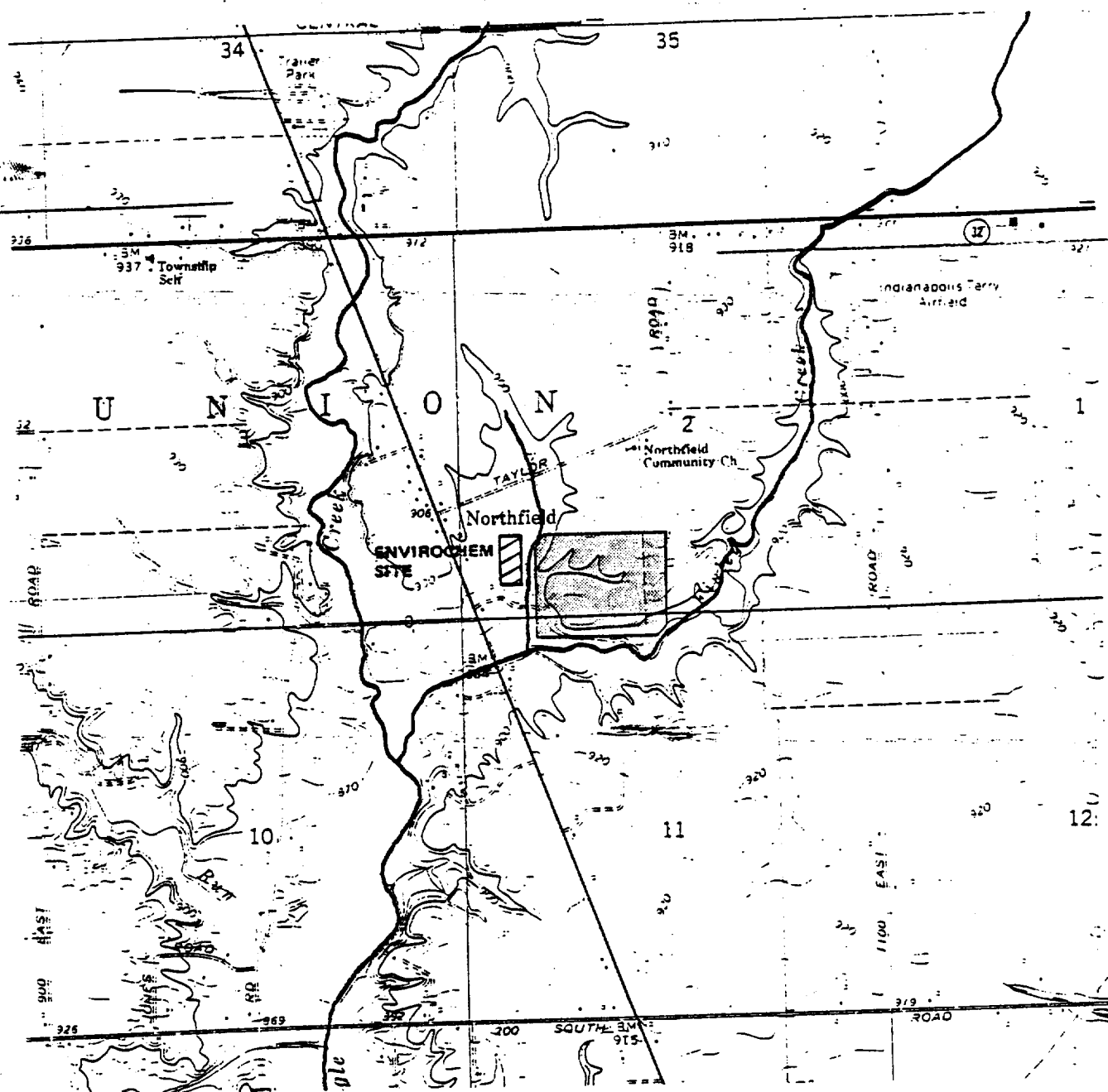




FIGURE 1  
LOCATION MAP  
ECC SITE



LEGEND

-  NORTHSIDE LANDFILL
-  SITE

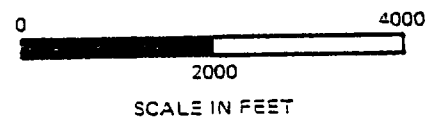


FIGURE 2  
VICINITY MAP  
ECC SITE

On September 18, 1979, the SPCB met to discuss the spill and discharge incidents at ECC. The board ratified an Agreed Order that included a fine and provisions to upgrade the methods of recordkeeping at the facility. Cooling water pond samples taken on November 2, 1979, were found to contain relatively high concentrations of arsenic, cadmium, chromium, lead, nickel, oil and grease, phenol, and zinc.

In December 1979, the U.S. EPA designated ECC as a potential hazardous waste site and began investigations under the Hazardous Materials Emergency Response Program. By April 17, 1980, the ISBH submitted documentation to the Indiana Environmental Management Board (EMB) concerning the ECC violations of the Environmental Management Act, the Air Pollution Control Law and the Stream Pollution Control Law. Specifically, the staff documented that:

- ° ECC posed a threat to pollute the environment.
- ° The company was burning chlorinated hydrocarbons and other solvents as boiler fuel without approval.
- ° Process water and contamination stormwater were discharged without approval.
- ° Spills of oil and other objectionable substances occurred and were not reported or effectively cleaned up. Based on these violations, the EMB referred the matter to the Office of the Attorney General on May 15, 1980, for appropriate enforcement.

On February 9, 1981, an ECC employee died of exposure to toxic vapors after entering a solvent tanker.

A Consent Decree was issued on July 1, 1981, by the Boone County Circuit Court imposing a \$50,000 civil penalty against ECC. Furthermore, the court placed ECC into receivership and prohibited the company from using Northside Sanitary Landfill for disposal of wastes. The decree gave ECC until November 1, 1982, to comply with environmental laws and regulations.

At this point, the ISBH began weekly monitoring of ECC's drum storage area to insure that action was being taken to reduce barrel inventory and improve storage facilities. The area was found to be extremely overcrowded with drums, some of which were damaged and leaking. By October of 1981, construction of a concrete drum storage pad was underway and drum inventory had been reduced to an estimated 20,000 barrels. By December, the number of leaking, formerly leaking, popped top, corroded/damaged, and bungless/open top drums had been reduced to about 225. In February 1982, the EMB placed a freeze on drum shipments to the facility before the Boone County Circuit Court to assure compliance with the Consent Decree regarding storage of drums, location of materials onsite and in transit, and the removal of sludge.

On May 5, 1982, ECC was ordered by the court to close and environmentally secure the site for failure to reduce hazardous waste inventories. By August 1982, ECC was found to be insolvent.



### 1.3 - Hazardous Materials Characterization

Hazardous materials are found in the following containments onsite:

- ° 47 bulk storage tanks with about 300,000 gallons of hazardous waste.
- ° About 25,000, 55-gallon drums.
- ° An estimated 1,000,000 gallons of contaminated water in a cooling water pond.
- ° An estimated 500,000 gallons of contaminated water in ponds on the north and south drum storage areas.

#### 1.3.1 - Bulk Storage Tanks

The bulk storage tanks are located mainly in the northern portion of the site surrounding the process building (see Figure 3). Known individual bulk tank storage volumes vary from 1,000 to 30,000 gallons. Table 1 is a partial bulk tank inventory. Of the remaining 19 tanks, at least 5 are tanker trucks that have been parked onsite. There are reportedly two buried tanks onsite.

Available test data indicate that sampling and analysis of the bulk storage tanks has been limited to one sample of a boiler fuel tank taken on May 6, 1980, by the ISBH. The fuel was composed of the following compounds:

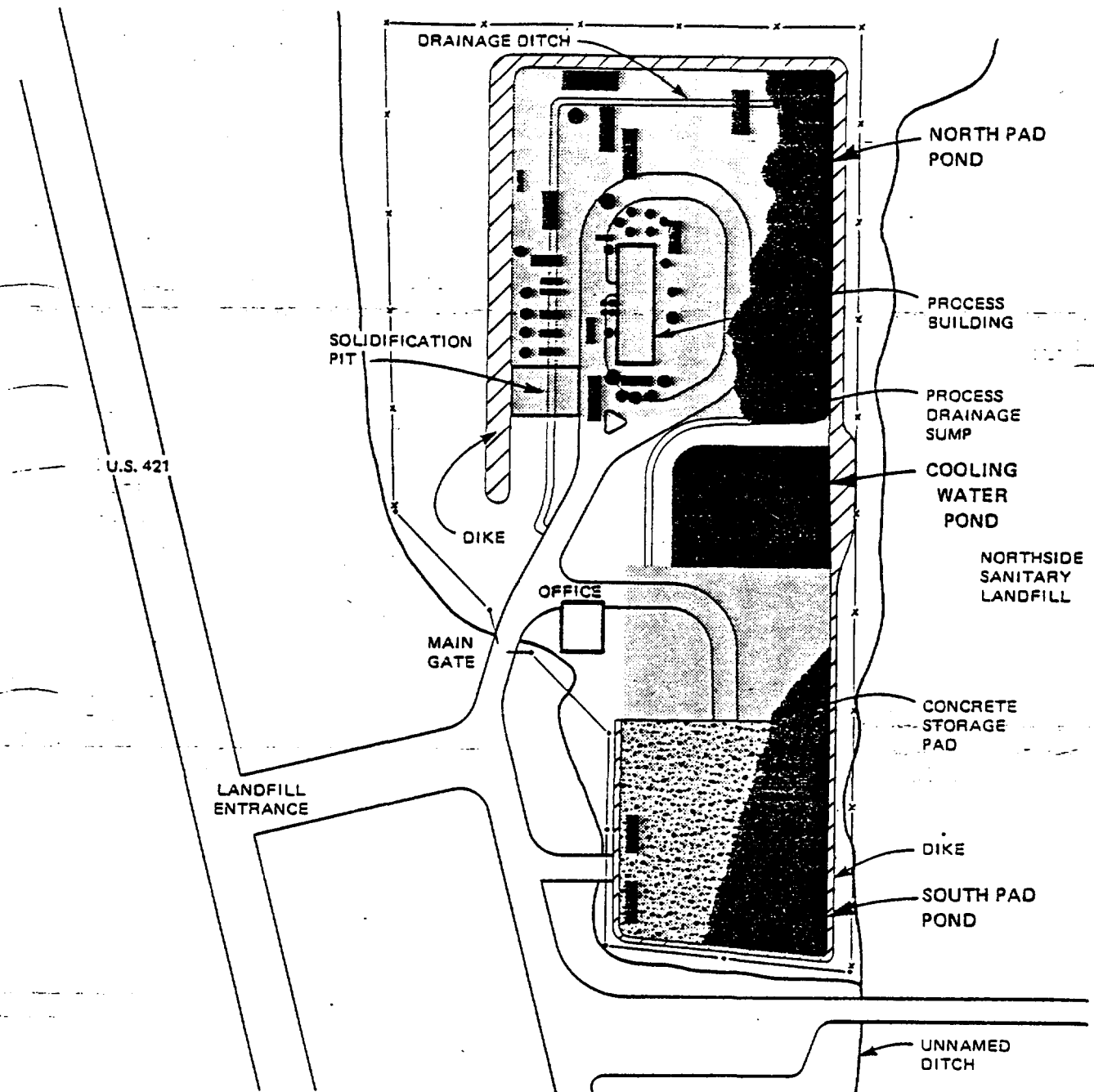
Octane	6.2%
Acetone	13.3%
1,1,1-trichloroethane	1.6%
Methyl Ethyl Ketone	13.7%
Trichloroethylene	1.3%
Methyl Iso-butyl Ketone	3.0%
Toluene	18.4%
P-xylene	5.6%
M-xylene	20%
O-Xylene	4.4%

Analysis for heavy metals found the following:






Cadmium	Less than 1 ug/l
Chromium	25 ug/l
Lead	74 ug/l
Nickel	4 ug/l
Zinc	179 ug/l

#### 1.3.2 - Fifty-five Gallon Drums

Fifty-five gallon drums are stored in the north and south drum storage areas, generally stacked three to four high (see Figure 3). An inventory of drums was conducted on November 25, 1981, six months before the site was closed. Results of the inventory are shown in Table 2.



# LEGEND

-  DRUM STORAGE AREA
-  TANKS
-  WOOD FENCE
-  STRANDED WIRE FENCE
-  CONCRETE PAD

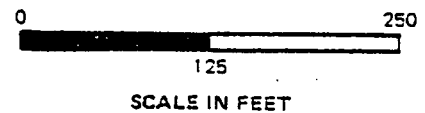


FIGURE 3  
LOCATION OF COOLING WATER  
AND DRUM STORAGE AREA PONDS  
ECC SITE

Table 1  
BULK STORAGE TANK INVENTORY

Tank ID	Contents	Capacity (gal)
A	Oil Processing	10,500
B	Solvent Still	10,500
C	Solvent Storage	10,500
D	Oil Storage	10,500
E	Solvent Coalescer	5,000
F	Fuel Oil Product Storage	30,000
G	Fuel Oil Product Storage	13,000
1	Waste Solvent & Oil Storage	10,500
2	Waste Solvent & Oil Storage	10,500
3	Waste Solvent & Oil Storage	5,000
4	Waste Solvent & Oil Storage	5,000
5	Boiler Fuel Oil	2,000
6	Clean Solvent Storage	1,500
7	Clean Solvent Storage	1,500
8	Clean Solvent Storage	20,000
9	Clean Solvent Storage	20,000
10	Still Bottom Storage	15,000
11	Waste Solvent Storage	10,500
12	Still Bottom Storage	1,500
13	Waste Solvent Storage	3,000
14	Waste Solvent Storage	4,500
15	Solvent Drying Process	1,000
16	Solvent Drying Process	1,000
17	Fuel Oil Storage	10,000
18	Fuel Oil Storage	10,000
19	Fuel Oil Storage	10,000
20	Fuel Oil Storage	7,500

Source: ECC

GLT90/19

Table 2  
GENERAL WASTE CATEGORIES FOR DRUMMED WASTES

	GENERAL WASTE CATEGORY DESCRIPTION	POTENTIAL DISPOSAL ACTIONS	ESTIMATED TOTAL NUMBER OF DRUMS
1.	Flammable Liquids (atomizable solvents)	Drum staging; compatibility testing; transport by P/V tankers; disposal by incineration	6,470
2.	Chlorinated Solvents (atomizable solvents)	Drum staging; compatibility testing; transport by P/V tankers; disposal by incineration	4,509
3.	Oils (atomizable liquids)	Drum staging; compatibility testing; transport by P/V tankers; disposal by incineration	699
4.	Flammable Solids (pumpable sludges)	Drum staging; compatibility testing; transport in repack fiberdrums or bulk tank trailer; disposal by incineration	3,595
5.	Solids (miscellaneous non- hazardous inert solids)	Drum staging; compatibility testing; transport in drums; disposal by landfilling	5,405
6.	Misc. Organic Liquids (nonflammable organic materials)	Drum staging; compatibility testing; transport in tank trailers; disposal by bulking & landfill	3,031
7.	Inorganic Solutions (misc. aqueous solutions)	Drum staging; compatibility testing; onsite treatment; transport in tank trucks; disposal by bulking & landfill	265
8.	Empty or Other	Crushing and disposal of drums in landfill	60
			24,034

(Source: Material Identification and Location, by Northrup, April 1982)

GLI412/2

Sampling and analysis of drums has not been undertaken. The majority of drums, however, are reportedly labeled and manifested according to RCRA regulations.

ECC has reported that 14,000 of the drums contain 30 to 100 percent solids. A majority of the drums with liquid contents contain various solvents and thinners. It is estimated that roughly one-half of the drums contain some flammable liquids.

### 1.3.3 - Cooling Water and Drum Storage Area Ponds

The cooling water pond is a rectangularly shaped basin in the central area of the ECC site (Figure 3). It receives surface runoff from the site and, as a result, has become contaminated. The pond has been sampled eight times from 1979 to 1982. Analytical results of several of these samples are shown in Table 3.

Contaminated water also exists in the north and south drum storage area. The approximate location of these ponded waters is shown in Figure 3. The ponds are about 2 feet deep at their deepest points. They have been sampled six times from 1979 to 1982. Table 3 presents analytical results for two of the six sampling dates.

Also shown in Table 3 are EPA ambient water quality criteria (WQC) for the substances found in the cooling pond or ponded waters.

### 1.4 - Environmental Setting

Union Township, the location of the ECC site, is included in the Tipton Till Plain physiographic unit as defined by Malott (1922). The Tipton Till Plain is an extensive flat to gently rolling area formed on glacial drift deposited during the Wisconsin glacial advance.

The glacial drift deposited in the area surrounding the site consists of Wisconsin ground moraine and glacial outwash. Silt and clay with intertill sand and gravel seams comprise the ground moraine, while the outwash deposits are primarily composed of sand and gravel. About 180 feet of unconsolidated materials overlie bedrock at the site.

On October 6, 1981, the ISBH collected soil samples from the storage area located on the northern portion of the ECC site. An analysis performed on these samples identified several organic and inorganic contaminants. Maximum levels of contaminants found in these soil samples were:

° Barium	0.3 mg/kg
° Cadmium	0.014 mg/kg
° Total Chromium	0.86 mg/kg
° Lead	0.63 mg/kg
° Mercury	0.0007 mg/kg
° Methylene Chloride	1,670 mg/kg
° Trichloroethylene	45,900 mg/kg
° 1,1,1-Trichloroethane	13,200 mg/kg
° Toluene	17,200 mg/kg
° Ethylbenzene	4,100 mg/kg
° Methyl Ethyl Ketone	35,600 mg/kg
° Xylene	12,900 mg/kg

Table 3.

CONTAMINANT CONCENTRATIONS AND WATER QUALITY CRITERIA FOR  
SUBSTANCES FOUND ONSITE (ug/l)

Substance	PONDED WATER SAMPLES ANALYSIS RESULTS						EPA AMBIENT WATER QUALITY CRITERIA			
	Cooling Water Pond			Drum Storage Area Ponds			For Protection of Human Health		For Protection of Aquatic Life	
	04/10/80	08/09/82	10/18/82	South 04/10/80	South 10/18/82	North 10/18/82	Toxicity	Carcinogenicity	Acute	Chronic
1,1-Dichloroethane		17					NCA		NDA	NDA
1,1,1-Trichloroethane	6,821	831	1,322		621	1,266	18,400		52,800	NDA
1,1,2-Trichloroethane	16							6.0	36,000	9,400
1,1-Dichloroethylene	152	95	2,848					0.33	30,300	NDA
1,2-Dichloroethylene	259	2,022		48	1,541	2,766	NCA		135,000	NDA
Perchloroethylene	1,297	12	0.6		1,176	71		1.7	5,280	840
Trichloroethylene	3,873	191	673		1,176	1,398		6.0	45,000	NDA
Dichloromethane	5,470	1,329	3,908	485	3,873	5,548		1.9	193,000	NDA
Trichloromethane		21						1.9	28,900	1,240
Trichlorofluoromethane				14				1.9	NDA	NDA
Toluene	2,700			935			14,360		17,500	NDA
Nitrophenol	270						NCA		NDA	NDA
Pentachlorophenol	38			103	5		1,010		55	3.2
Phenol	1,930	15,000	396		460	325	3,500		10,200	2,560
2,4-Dimethylphenol		260	251	349	236	121	NCA		2,120	NDA
2,4,6-Trichlorophenol			5		4	3		12	720	720
Benzene						463		6.6	5,300	NDA
Methylbenzene		858	974		1,035	1,132				
Ethylbenzene		110		1,188			1,400		32,000	NDA
1,3-Dimethylbenzene		98								
1,2 & 1,4-Dimethylbenzene		79								
1,3-Dichlorobenzene			0.5		17	92	400		5,020	1,510
1,4-Dichlorobenzene			0.4		15	86	400		1,120	763
1,2-Dichlorobenzene			0.5	27	18	97	400		2,000	2,000
Diethylphthalate	27	86	47	433	32		350,000		52,100	NDA
Dimethylphthalate	311	240	175	513	369	164	313,000		33,000	NDA
Butylbenzylphthalate			1,122		3,277	2,457	NCA		3,300	220
Di-N-Butylphthalate		76	29		87	135	34,000		940	NDA
Naphthalene			12		16	29	NCA		23,000	620
Isophorone		3,200					5,200		NDA	NDA
P-Chloro-M-Cresol				91		4	NCA		NDA	NDA

NCA = Insufficient data available upon which to derive a criterion.

NDA = No toxicity data available.

1980 EPA Ambient Water Quality Criteria for the protection of human health from the toxic properties of a pollutant ingested through water. Contaminated aquatic organisms assume a daily ingestion of 2 liters of water and 6.5 grams of potentially contaminated fish products.

2 No criteria available. Values are lowest reported toxic concentrations in freshwater

A well-developed drainage pattern exists in the area surrounding the ECC site. The principle surface drainage features are Eagle Creek and Finley Creek, an associated tributary. Two minor surface drainage features are located adjacent to the site. An unnamed ditch flows south along the eastern site boundary and converges about 1,000 feet downstream from the site with Finley Creek. The other unnamed ditch flows southwest along the western and southern site boundaries before discharging near the southeast site corner, into the unnamed tributary of Finley Creek. Finley Creek converges with Eagle Creek about one-half mile south-west of the site. Eagle Creek then flows south for about 10 miles before discharging into the Eagle Creek Reservoir. The site is located outside the 100-year flood plain.

Natural surface water runoff from the area surrounding the site flows toward the unnamed tributary of Finley Creek or toward Finley Creek. The ECC site has a bermed perimeter to prevent the escape of surface water runoff. The runoff that occurs is channeled towards the cooling water pond located along the eastern site boundary.

Contamination of surface water offsite has been determined on many occasions by the ISBH. Levels of some organic compounds found in unnamed drainageway were:

° Methylene Chloride	350 ug/l
° 1,1-Dichloroethane	26 ug/l
° Tetrachloroethylene	2 ug/l
° Methy Ethy Ketone	270 ug/l

Stream sediment samples collected offsite also indicated contamination downstream from the ECC and Northside Sanitary Landfill sites. A March 10, 1981, investigation by the ISBH found elevated downstream heavy metal levels in the unnamed drainageway adjacent to the eastern site boundary. Levels of metals found in the downstream sediments were:

° Copper	20,000 ug/kg
° Lead	89,000 ug/kg
° Mercury	40 ug/kg
° Nickel	14,000 ug/kg

The ISBH sampled ground water from two onsite wells on March 17, 1981. These wells were 38 and 71 feet deep. The analysis of the sample from the shallower well indicated the presence of several organic compounds, but no heavy metals were found in concentrations greater than the detection levels. The organic contaminants found in the shallower ground water sample were methylene chloride (5.7 ug/l), 1,1-dichloroethane (950 ug/l), and trichloroethylene (10 ug/l). Ground water from the deeper ECC well showed no sign of organic chemical or heavy metal contamination, except for high levels of strontium, the significance of which is unknown at this time.

On November 29, 1982, the ISBH sampled ground water from five monitoring wells in the area around the Northside Sanitary Landfill and ECC. The analysis produced no unusual inorganic results, however, several organic chemicals were present in four of the five samples. Among the organic chemicals present were:

° 1,1-Dichloroethane	160 ug/l
° Trans-1,2-Dichlorethylene	580 ug/l
° Methyl Ethyl Ketone	2,600 ug/l



## II. SUPERFUND ACTIVITIES

### 2.1 - Prioritization

During June, 1982, Indiana State Board of Health (ISBH) staff submitted ECC as a candidate site for the National Priorities List (NPL). ISBH staff prepared the Hazardous Ranking System (HRS) Worksheets and Documentation Records (attachment 1). This data underwent quality assurance/quality control checks by U.S. EPA Region V staff and U.S. EPA Headquarters staff.

The site was included on the proposed NPL, published December 30, 1982. The HRS score is 46.44. The site appears within Group 4 on the NPL.

### 2.2 - Remedial Action Master Plan (RAMP)

On January 3, 1983, U.S. EPA Region V initiated preparation of the RAMP. The RAMP summarizes site data and specifies areas of study during a remedial investigation. Based on the information presented in the draft RAMP submitted February 14, 1983, the U.S. EPA and the State of Indiana negotiated a Superfund State contract.

### 2.3 - Superfund State Contract

On February 24, 1983, the U.S. EPA and the State of Indiana entered into a Superfund State Contract for a focused study, remedial investigation and feasibility study at ECC.

The contract (attachment 2) obligates \$310,200.00 for the investigation and studies. The scope of work provides for an examination of three types of remedial actions:

- ° Initial remedial measures
- ° Source control remedial actions
- ° Offsite remedial actions

Initial remedial measures (IRM's) are remedial actions that are conducted before the selection of an appropriate remedial action if they are determined to be feasible and necessary to limit exposure or threat of exposure to a significant health or environmental hazard and if they are cost-effective. IRM's can be carried out only on sites listed on the NPL. The essential criterion for determining the need for IRM's is the existence of an actual or potential significant threat to public health or the environment. Under extreme circumstances, the planned removal of hazardous substances can be carried out as an IRM. However, in accordance with Federal regulations, such actions must be cost-effective.

Source control remedial actions are taken at or near the original source of the hazardous substances or contaminated materials whenever there are inadequate natural or manmade barriers to retard migration. If most of the substances have migrated away from the original source, source control remedial actions may be required. Treatment of the liquids in the cooling water pond at the ECC site and discharge to Finley Creek is an example of a source control remedial action alternative. An example offsite remedial action alternative is withdrawal of any contaminated groundwater from the plume area downstream of the site, followed by treatment and discharge to a nearby drainage basin.

There must be sufficient information and data available before any source control or offsite remedial measures can be carried out.

#### 2.4 - Initial Remedial Measures

The contract provides \$10,200 to evaluate a limited number of initial remedial alternatives. The focused study recommends the following measures:

- ° Construct a 6-foot high steel fence around the site. This action is intended to prevent unauthorized direct contact with hazardous substances and contaminated materials onsite before and during the implementation of remedial measures.
- ° Place warning signs around the perimeter of the site and on the fence to warn of the danger of unauthorized entry. This action is intended to prevent direct contact with any hazardous substances and contaminated materials onsite before and during the implementation of remedial measures.
- ° Remove all materials from the bulk storage tanks as soon as possible and transport them to an approved disposal facility. This action is intended to reduce the imminent hazard of fire and explosion by quickly removing the bulk tank contents.
- ° Remove all drums as soon as possible. The intent of this action is to reduce the imminent hazard presented by the drums stored onsite.
- ° Control site runoff and direct it to the cooling water pond for eventual treatment. This action is intended to use the existing cooling water pond as a collection sump for site runoff during initial remedial activities. Tank and drum washings, decontamination water and other miscellaneous drainages will also be directed to the cooling water pond.
- ° Provide a trailer-mounted activated carbon wastewater treatment system to treat the slightly contaminated water from the cooling water pond and discharge the treated water to Finley Creek. The intent of this action is to treat cooling water pond contents with a temporary treatment system, discharging the clean treated water to the relatively uncontaminated Finley Creek.

- ° Relocate the existing office and process building power lines offsite. This IRM is intended to prevent a fire and/or explosion onsite due to accidental contact with the existing power line.

## 2.5 - Remedial Investigations

The following remedial investigation activities are considered necessary and are recommended for the ECC site before feasibility studies for alternative remedial actions are undertaken:

- ° Conduct a health and safety site assessment to determine if there are areas within the site that present either potentially hazardous chemical exposure levels or dangerous physical features and layouts.
- ° Perform a topographic survey of the site and neighboring drainage ditch to provide data on physical features and facilities.
- ° Sample and analyze the site surface soils and solidification pit contents to adequately characterize the degree and extent of contamination.
- ° Locate and install additional groundwater monitoring wells to determine the existence of and to define the horizontal and vertical extent of any contaminant plume and to provide a groundwater monitoring network (shallow, mid-level, and deep) to detect movement of any contaminant plume.
- ° Sample and analyze the surface water and bottom sediments in the neighboring drainage ditch, Finley Creek and Eagle Creek to adequately characterize their degree of contamination.
- ° Sample and analyze the groundwater in the monitoring wells to provide a more adequate characterization of the shallow aquifer, mid-level aquifer, and deep aquifer groundwater.

## 2.6 - Cost Estimate and Time Schedule

The cost estimates and time schedules for the initial remedial measures and the remedial investigation activities are shown in Table 4 and Table 5. The cost estimate ranges given in the table are commensurate with the range of accuracy of an order-of-magnitude level cost estimate. That is, the high and low cost estimates given are -30 percent and +50 percent respectively of the actual estimated cost.

Table 4  
IRM COSTS AND TIME SCHEDULE  
ECC SITE

Initial Remedial Measures	Estimated Cost		Schedule of Weeks											
	Low(\$)	High(\$)	2	4	6	8	10	12	14	16	18	20	22	24
Sampling and Analysis of Private Wells	6,900	14,700	-----											
Construct New Fence	13,200	28,300	-----											
Provide Warning Signs	600	1,200												
Removal of Bulk Tank Contents	181,000	388,000	-----											
Drum Removal	2,420,000	5,186,000	-----											
Site Surface Runoff Control	4,000	8,600	-----											
Power Line Removal	13,000	18,000	-----											
Cooling Water Pond Treatment and Discharge	250,000	500,000	-----											
Fire Contingency Plan	2,500	5,100	-----											
TOTAL	\$2,891,100	\$6,149,900												

Table 5  
ESTIMATED COST AND SCHEDULE OF RI/FS ACTIVITIES  
ECC SITE

Task	Estimated Cost		Schedule (Months Elapsed)											
	Low	High	0	2	4	6	8	10	12	14	16	18	20	
1. Work Plan Preparation	\$ 5,900	\$12,600	---											
2. Site Definition Activities	37,300	72,200	-----											
3. Detailed Site Characterization Studies	155,100	332,500			-----									
4. Remedial Investigation Report	6,200	13,100							-----					
5. Evaluation of Remedial Action Alternatives	13,300	28,400								-----				
6. Feasibility Report	9,400	20,400									-----			
7. Conceptual Design	20,600	44,100										-----		
8. Project Management	<u>17,200</u>	<u>37,000</u>	-----											
TOTAL	\$265,000	\$560,300												

CLT90/14

Facility name: <u>Environmental Conservation &amp; Chemical Corporation</u>	
Location: <u>Section 2, T18N, R2E, Boone County, Indiana</u>	
EPA Region: <u>V</u>	
Person(s) in charge of the facility: <u>Tim O'Mara</u>	
Name of Reviewer: <u>Mark Richards</u>	Date: <u>7-21-82</u>
General description of the facility: (For example: landfill, surface impoundment, pile, container; types of hazardous substances; location of the facility; contamination route of major concern; types of information needed for rating; agency action, etc.)	
<u>Container facility storing and processing solvents (chlorinated</u>	
<u>and unchlorinated), acids and caustics. Located on U.S. 421</u>	
<u>approximately 5 miles north of Zionsville. Groundwater</u>	
<u>contamination is documented and is area of major concern,</u>	
<u>however, air data not available but <math>S_{FE}</math> indicates air data</u>	
<u>would be helpful.</u>	
Scores: $S_M = 46.44$ , $S_{GW} = 79.59$ , $S_{SW} = 109.1$ , $S_a = 0$ )	
$S_{FE} = 49.58$	
$S_{DC} = 25.00$	

FIGURE 1  
HRS COVER SHEET

Ground Water Route Work Sheet						
Rating Factor	Assigned Value (Circle One)	Multi- plier	Score	Max. Score	Ref. (Section)	
<b>1</b> Observed Release	0 <b>(45)</b>	1	45	45	3.1	
If observed release is given a score of 45, proceed to line <b>4</b> . If observed release is given a score of 0, proceed to line <b>2</b> .						
<b>2</b> Route Characteristics					3.2	
Depth to Aquifer of Concern	0 1 2 3	2	6			
Net Precipitation	0 1 2 3	1	3			
Permeability of the Unsaturated Zone	0 1 2 3	1	3			
Physical State	0 1 2 3	1	3			
Total Route Characteristics Score				15		
<b>3</b> Containment	0 1 2 3	1	3		3.3	
<b>4</b> Waste Characteristics					3.4	
Toxicity/Persistence	0 3 6 9 12 15 <b>(18)</b>	1	18	18		
Hazardous Waste Quantity	0 1 2 3 4 5 6 7 <b>(8)</b>	1	8	8		
Total Waste Characteristics Score			26	26		
<b>5</b> Targets					3.5	
Ground Water Use	0 1 2 <b>(3)</b>	3	9	9		
Distance to Nearest Well/Population Served	0 4 6 8 10 12 <b>(16)</b> 18 20 24 <b>(30)</b> 32 35 40	1	30	40		
Total Targets Score			39	49		
<b>6</b> If line <b>1</b> is 45, multiply <b>1</b> x <b>4</b> x <b>5</b>						
If line <b>1</b> is 0, multiply <b>2</b> x <b>3</b> x <b>4</b> x <b>5</b>			45 x 30	57,330		
<b>7</b> Divide line <b>6</b> by 57,330 and multiply by 100			S <sub>gw</sub> = 79.59			

**FIGURE 2**  
**GROUND WATER ROUTE WORK SHEET**

Surface Water Route Work Sheet						
Rating Factor	Assigned Value (Circle One)	Multi- plier	Score	Max. Score	Ref. (Section)	
<b>1</b> Observed Release	0 <b>(45)</b>	1	45	45	4.1	
If observed release is given a value of 45, proceed to line <b>4</b> . If observed release is given a value of 0, proceed to line <b>2</b> .						
<b>2</b> Route Characteristics					4.2	
Facility Slope and Intervening Terrain	0 1 2 3	1		3		
1-yr. 24-hr. Rainfall	0 1 2 3	1		3		
Distance to Nearest Surface Water	0 1 2 3	2		6		
Physical State	0 1 2 3	1		3		
Total Route Characteristics Score				15		
<b>3</b> Containment	0 1 2 3	1		3	4.3	
<b>4</b> Waste Characteristics					4.4	
Toxicity/Persistence	0 3 6 9 12 15 <b>(18)</b>	1	18	18		
Hazardous Waste Quantity	0 1 2 3 4 5 6 7 <b>(8)</b>	1	8	8		
Total Waste Characteristics Score			26	26		
<b>5</b> Targets					4.5	
Surface Water Use	0 1 <b>(2)</b> 3	3	6	9		
Distance to a Sensitive Environment	<b>(0)</b> 1 2 3	2	0	6		
Population Served/Distance to Water Intake Downstream	<b>(0)</b> 4 6 8 10 12 16 18 20 24 30 32 35 40	1	0	40		
Total Targets Score			6	55		
<b>6</b> If line <b>1</b> is 45, multiply <b>1</b> x <b>4</b> x <b>5</b> If line <b>1</b> is 0, multiply <b>2</b> x <b>3</b> x <b>4</b> x <b>5</b>			7020	64,350		
<b>7</b> Divide line <b>6</b> by 64,350 and multiply by 100			$S_{sw} = 10.91$			

**FIGURE 7**  
**SURFACE WATER ROUTE WORK SHEET**



Air Route Work Sheet						
Rating Factor	Assigned Value (Circle One)	Multi- plier	Score	Max. Score	Ref. (Section)	
<b>1</b> Observed Release	<b>0</b> 45	1	0	45	5.1	
Date and Location:						
Sampling Protocol:						
If line <b>1</b> is 0, the $S_a = 0$ . Enter on line <b>5</b> . If line <b>1</b> is 45, then proceed to line <b>2</b> .						
<b>2</b> Waste Characteristics					5.2	
Reactivity and Incompatibility	0 1 2 3	1		3		
Toxicity	0 1 2 3	3		9		
Hazardous Waste Quantity	0 1 2 3 4 5 6 7 8	1		8		
Total Waste Characteristics Score				20		
<b>3</b> Targets					5.3	
Population Within 4-Mile Radius	0 9 12 15 18 21 24 27 30	1		30		
Distance to Sensitive Environment	0 1 2 3	2		6		
Land Use	0 1 2 3	1		3		
Total Targets Score				39		
<b>4</b> Multiply <b>1</b> x <b>2</b> x <b>3</b>				35,100		
<b>5</b> Divide line <b>4</b> by 35,100 and multiply by 100			$S_a = 0$			

**FIGURE 9**  
**AIR ROUTE WORK SHEET**

		s	s <sup>2</sup>	
	Groundwater Route Score (S <sub>gw</sub> )	79.59	6334.57	
	Surface Water Route Score (S <sub>sw</sub> )	10.91	119.03	
	Air Route Score (S <sub>a</sub> )	0	0	
	$S_{gw}^2 + S_{sw}^2 + S_a^2$		6453.60	
	$\sqrt{S_{gw}^2 + S_{sw}^2 + S_a^2}$		80.33	
	$\sqrt{S_{gw}^2 + S_{sw}^2 + S_a^2} / 1.73 = S_M =$		46.44	

FIGURE 10  
WORKSHEET FOR COMPUTING S<sub>M</sub>

OF SHEET

Fire and Explosion Work Sheet						
Rating Factor	Assigned Value (Circle One)	Multi- plier	Score	Max. Score	Ref. (Section)	
1 Containment	3	1	3	3	7.1	
2 Waste Characteristics					7.2	
Direct Evidence	0 1 2 3	1	0	3		
Ignitability	0 1 2 3	1	3	3		
Reactivity	0 1 2 3	1	0	3		
Incompatibility	0 1 2 3	1	3	3		
Hazardous Waste Quantity	0 1 2 3 4 5 6 7 8	1	8	8		
Total Waste Characteristics Score			14	20		
3 Targets					7.3	
Distance to Nearest Population	0 1 2 3 4 5	1	5	5		
Distance to Nearest Building	0 1 2 3	1	3	3		
Distance to Sensitive Environment	0 1 2 3	1	0	3		
Land Use	0 1 2 3	1	3	3		
Population Within 2-Mile Radius	0 1 2 3 4 5	1	3	5		
Buildings Within 2-Mile Radius	0 1 2 3 4 5	1	3	5		
Total Targets Score			17	24		
4 Multiply 1 x 2 x 3			714	1,440		
5 Divide line 4 by 1,440 and multiply by 100			SFE = 49.58			

FIGURE 11  
FIRE AND EXPLOSION WORK SHEET

Direct Contact Work Sheet						
Rating Factor	Assigned Value (Circle One)	Multi- plier	Score	Max. Score	Ref. (Section)	
<b>1</b> Observed Incident	0 (45)	1	45	45	8.1	
If line <b>1</b> is 45, proceed to line <b>4</b> If line <b>1</b> is 0, proceed to line <b>2</b>						
<b>2</b> Accessibility	0 1 2 3	1		3	8.2	
<b>3</b> Containment	0 15	1		15	8.3	
<b>4</b> Waste Characteristics Toxicity	0 1 2 (3)	5	15	15	8.4	
<b>5</b> Targets					8.5	
Population Within a 1-Mile Radius	0 1 (2) 3 4 5	4	8	20		
Distance to a Critical Habitat	(0) 1 2 3	4	0	12		
Total Targets Score			8	32		
<b>6</b> If line <b>1</b> is 45, multiply <b>1</b> x <b>4</b> x <b>5</b> If line <b>1</b> is 0, multiply <b>2</b> x <b>3</b> x <b>4</b> x <b>5</b>			5400	21,600		
<b>7</b> Divide line <b>6</b> by 21,600 and multiply by 100			SDC = 25.00			

**FIGURE 12**  
**DIRECT CONTACT WORK SHEET**

June 28, 1982

DOCUMENTATION RECORDS  
FOR  
HAZARD RANKING SYSTEM

1111111111

INSTRUCTIONS: The purpose of these records is to provide a convenient way to prepare an auditable record of the data and documentation used to apply the Hazard Ranking System to a given facility. As briefly as possible summarize the information you used to assign the score for each factor (e.g., "Waste quantity = 4,230 drums plus 800 cubic yards of sludges"). The source of information should be provided for each entry and should be a bibliographic-type reference that will make the document used for a given data point easier to find. Include the location of the document and consider appending a copy of the relevant page(s) for ease of review.

FACILITY NAME: Environmental Conservation & Chemical Corporation

LOCATION: Section 2, T18N, R2E, Boone County, Indiana

## GROUND WATER ROUTE

### 1 OBSERVED RELEASE

Contaminants detected (5 maximum):

1. 1, 1 Dichloroethane
2. Trichloroethylene
3. 1,1,1 Trichloroethane

Rationale for attributing the contaminants to the facility:  
Found in groundwater samples taken onsite during July 1981. Waste storage tanks at Wells have since been destroyed.

SEE ATTACHMENT 1

\* \* \*

### 2 ROUTE CHARACTERISTICS

#### Depth to Aquifer of Concern

Name/description of aquifers(s) of concern:

Depth(s) from the ground surface to the highest seasonal level of the saturated zone [water table(s)] of the aquifer of concern:

Depth from the ground surface to the lowest point of waste disposal/storage:

Net Precipitation

Mean annual or seasonal precipitation (list months for seasonal):

Mean annual lake or seasonal evaporation (list months for seasonal):

Net precipitation (subtract the above figures):

Permeability of Unsaturated Zone

Soil type in unsaturated zone:

Permeability associated with soil type:

Physical State

Physical state of substances at time of disposal (or at present time for generated gases):

\* \* \*

### 3 CONTAINMENT

#### Containment

Method(s) of waste or leachate containment evaluated:

Method with highest score:

### 4 WASTE CHARACTERISTICS

#### Toxicity and Persistence

Compound(s) evaluated:

1. 1,1,1 Trichloroethane
2. 1,1 Dichloroethane
3. Trichloroethylene
4. PCB (From cooling pond analysis).  
(SEE ATTACHMENT 2)

Compound with highest score:

PCB

#### Hazardous Waste Quantity

Total quantity of hazardous substances at the facility, excluding those with a containment score of 0 (Give a reasonable estimate even if quantity is above maximum):

Drums 21,000  
Bulk 400,000 gallons - (100,000 gal. in treatment)  
(300,000 gal. in storage )

SEE ATTACHMENT 3

Basis of estimating and/or computing waste quantity:

Closure plan submitted 6-4-82 (Attachment 3)

\* \* \*



5 TARGETS

Ground Water Use

Use(s) of aquifer(s) of concern within a 3-mile radius of the facility:

Drinking water

(SEE ATTACHMENT 4)

Distance to Nearest Well

Location of nearest well drawing from aquifer of concern or occupied building not served by a public water supply:

John Bankert well located southwest of storage area.

(SEE ATTACHMENT 5)

Distance to above well or building:

< 500 feet

Population Served by Ground Water Wells Within a 3-Mile Radius

Identified water-supply well(s) drawing from aquifer(s) of concern within a 3-mile radius and populations served by each:

579 homes x 3.8 persons/home = 2,200 residents

(SEE ATTACHMENT 4)

Computation of land area irrigated by supply well(s) drawing from aquifer(s) of concern within a 3-mile radius, and conversion to population (1.5 people per acre):

0

Total population served by ground water within a 3-mile radius:

2,200

## SURFACE WATER ROUTE

### 1 OBSERVED RELEASE

Contaminants detected in surface water at the facility or downhill from facility (5 maximum):

1. PCB
2. Methylene Ketone

(SEE ATTACHMENT 2)

Rationale for attributing the contaminants to the facility:

Observed in samples taken 3-9-81 from cooling pond. (See Attachment 2)

Cooling pond overflow into unnamed ditch as documented in June 28, 1982; correspondence with Gary Watson.

(SEE ATTACHMENT 6)

\* \* \*

### 2 ROUTE CHARACTERISTICS

#### Facility Slope and Intervening Terrain

Average slope of facility in percent:

Name/description of nearest downslope surface water:

Average slope of terrain between facility and above-cited surface water body in percent:

Is the facility located either totally or partially in surface water?

Is the facility completely surrounded by areas of higher elevation?

1-Year 24-Hour Rainfall in Inches

Distance to Nearest Downslope Surface Water

Physical State of Waste

\*\*\*

### 3 CONTAINMENT

#### Containment

Method(s) of waste or leachate containment evaluated:

Method with highest score:

#### 4 WASTE CHARACTERISTICS

##### Toxicity and Persistence

Compound(s) evaluated

PCB (From Attachment 2)

Compound with highest score:

PCB

##### Hazardous Waste Quantity

Total quantity of hazardous substances at the facility, excluding those with a containment score of 0 (Give a reasonable estimate even if quantity is above maximum):

Drums 21,000  
Bulk 400,000 gallons (100,000 gal. in treatment)  
(300,000 gal. in storage)

(SEE ATTACHMENT 3)

Basis of estimating and/or computing waste quantity:

Closure plan submitted on 6-4-82.

(Attachment 3)

\* \* \*

#### 5 TARGETS

##### Surface Water Use

Use(s) of surface water within 3 miles downstream of the hazardous substance:

Fishing, recreation

Is there tidal influence?

NO

Distance to a Sensitive Environment

Distance to 5-acre (minimum) coastal wetland, if 2 miles or less:

Distance to 5-acre (minimum) fresh-water wetland, if 1 mile or less:

Distance to critical habitat of an endangered species or national wildlife refuge, if 1 mile or less:

Population Served by Surface Water

Location(s) of water-supply intake(s) within 3 miles (free-flowing bodies) or 1 mile (static water bodies) downstream of the hazardous substance and population served by each intake:

Computation of land area irrigated by above-cited intake(s) and  
conversion to population (1.5 people per acre):

Total population served:

Name/description of nearest of above water bodies:

Distance to above-cited intakes, measured in stream miles.

AIR ROUTE

1 OBSERVED RELEASE

Contaminants detected:

NONE

Date and location of detection of contaminants

Methods used to detect the contaminants:

Rationale for attributing the contaminants to the site:

\* \* \*

2 WASTE CHARACTERISTICS

Reactivity and Incompatibility

Most reactive compound:

None (Not enough data available)

Most incompatible pair of compounds:

Acids & Caustics (40 drums)

(SEE ATTACHMENT 4, pg. 4)

Toxicity

Most toxic compound:

Hazardous Waste Quantity

Total quantity of hazardous waste:

Basis of estimating and/or computing waste quantity:

\* \* \*

3 TARGETS

Population Within 4-Mile Radius

Circle radius used, give population, and indicate how determined:

0 to 4 mi

0 to 1 mi

0 to 1/2 mi

0 to 1/4 mi

Distance to a Sensitive Environment

Distance to 5-acre (minimum) coastal wetland, if 2 miles or less:

Distance to 5-acre (minimum) fresh-water wetland, if 1 mile or less:



Distance to critical habitat of an endangered species, if 1 mile or less:

Land Use

Distance to commercial/industrial area, if 1 mile or less:

Distance to national or state park, forest, or wildlife reserve, if 2 miles or less:

Distance to residential area, if 2 miles or less:

Distance to agricultural land in production within past 5 years, if 1 mile or less:

Distance to prime agricultural land in production within past 5 years, if 2 miles or less:

Is a historic or landmark site (National Register or Historic Places and National Natural Landmarks) within the view of the site?

DIRECT CONTACT WORKSHEET

XXXX

On February 9, 1981, Stephen Foster and Martin Roth, employees of ECC, entered a tanker that had been transporting solvents to perform maintenance. Mr. Foster entered the tank first wearing a respirator but was overcome. Mr. Roth went in after Mr. Foster to pull him out and was also overcome. Mr. Roth was subsequently revived by emergency medical personnel. Mr. Foster died of exposure to the toxic vapors.

Superfund State Contract for an Investigation/Feasibility Study  
to Evaluate Initial Remedial Measures (IRM Investigation/Feasibility  
Study), Remedial Investigation, and Feasibility Study at the  
Enviro-Chem Site Between the State of Indiana and the  
U.S. Environmental Protection Agency

I. Authority

This contract is entered into pursuant to Sections 104(a)(1),  
(b), (c)(2) and (c)(3) of the Comprehensive Environmental  
Response, Compensation and Liability Act of 1980 ("CERCLA"),  
42 U.S.C. 9601 et seq.

II. Purpose

- A. The purpose of this contract is to perform: 1) an investigation/feasibility study to evaluate initial remedial measures (Phase I); 2) a remedial investigation (Phase II); and 3) a feasibility study (Phase III) for the Environmental Conservation and Chemical Corporation site, Boone County, Indiana, an uncontrolled hazardous waste site. Said company is the former Enviro-Chem Corporation and the site is so referred to herein.
- B. The parties hereto have agreed to the Statement of Work (SOW), attached as Appendix A, which lists the tasks to be performed pursuant to this contract. In the event of a conflict between the SOW and the terms of the contract the contract shall prevail.
- C. The purpose of this contract is to delineate the responsibilities of the parties and provide the assurances required by CERCLA.
- D. Upon completion of Phase I and/or Phase III, the U.S. Environmental Protection Agency (U.S. EPA) and Environmental Management Board (EMB) may amend this contract or enter into a contract or cooperative agreement regarding funding of initial remedial measures or remedial activities and future response actions at the site.

III. Parties

- A. This contract is between the U.S. EPA and the EMB. Included in this contract is a certification by the Attorney General for the State of Indiana (the "State") that the EMB which enters into this contract on behalf of the State, has the legal authority to do so and to fulfill the terms of this contract. Nothing in this contract is intended to diminish or otherwise effect the statutory authority of the agencies involved.
- B. U.S. EPA designates Jonac Dikinis, Federal On-Scene Coordinator, Remedial Response Branch, Region V, U.S. EPA, 230 S. Dearborn Street, Chicago, Illinois 60604, (312) 826-0542, to serve as Project Officer for this contract.

- C. The EMS designates James Knoy, ISBH, 1330 West Michigan Street, Indianapolis, Indiana 46205, (317) 633-0208, as Project Coordinator.
- D. The Project Officer in consultation with the Project Coordinator is authorized to make project decisions, provided that such a decision does not increase the cost or the scope of the actions and activities established in this contract without formal amendment by the parties involved.

#### IV. Responsibilities of Parties

- A. U.S. EPA shall procure the services of a contractor to perform the tasks in the SOW. Further, U.S. EPA shall furnish the necessary personnel, materials, services, facilities and otherwise do all things necessary for or incidental to the performance of its responsibilities under this contract. U.S. EPA will closely coordinate activities and consult with the EMS on all U.S. EPA decisions regarding the implementation of this contract.
- B. The State shall at its own cost and expense furnish the necessary personnel, materials, services, and facilities and otherwise do all things necessary for or incidental to the performance of its responsibilities under this contract. None of the expenses incurred by the State in performing said tasks shall be paid or reimbursed by the Hazardous Substances Response Trust Fund (42 U.S.C. 9631) nor counted toward any cost-sharing requirements relating to the site.
- C. The State shall assist U.S. EPA in securing any permits that are necessary to implement the activities described in the SOW.

#### V. Immediate Removal Action

Any immediate removal activities conducted pursuant to the National Oil & Hazardous Substances Contingency Plan (40 CFR 300.65) shall not be restricted by the terms of this contract. The remedial activities in the SOW for this contract may be suspended by U.S. EPA, in consultation with the EMS, during the immediate removal action.

#### VI. Period of Performance

The expected duration of this contract is approximately 9 months. The focused investigation/feasibility study is expected to be completed within 45 days (Phase I).

The contract becomes effective on the date the contract is signed by the last remaining party. Both Phase I and Phase II will commence concurrently.

#### VII. Project Expenses

- A. The State will pay 10 percent of the costs of those actions described in the SOW.

- R. U.S. EPA will pay 90 percent of those actions described in the SOW.
- C. The projected total cost of the activities described in the SOW is \$310,200. The State's share is \$31,020. The costs incurred to perform these activities (which are described in the SOW) will not exceed \$310,200, and the State's share will not exceed \$31,020, unless this contract is amended pursuant to paragraph XV.
- D. Upon completion of the activities in the SOW, U.S. EPA shall determine the final cost of the project and notify the State of its cost-share requirement. The State cost share requirement, pursuant to Paragraph VII(A) above, may be made from the Indiana Hazardous Substances Emergency Response Trust Fund. All payments shall be made payable to U.S. EPA and sent to:

U.S. Environmental Protection Agency  
 Accounting Operations  
 Post Office Box 2971  
 Washington, D.C. 20013  
 Attention: Kevin Brittingham, PM-2666  
 Collection Officer for Superfund  
 Room 3419M

#### VIII. Off-Site Storage, Destruction, Treatment, or Disposition of Wastes and Operation and Maintenance

- A. In the event that the State and U.S. EPA enter into an agreement to undertake initial remedial measures and/or remedial action, and the State and U.S. EPA determine that off-site treatment, storage or disposal for the material will be required, the State shall identify one or more authorized hazardous waste disposal facilities that have adequate capacity, capability, and owner acceptance to receive the hazardous substances designated for off-site storage, destruction, treatment or disposal. The hazardous waste facilities proposed by the State, which need not be located within the State, must be in compliance with the requirements of Subtitle C of the Solid Waste Disposal Act, and such facilities must also be accepted by U.S. EPA.
- B. Pursuant to CERCLA Subsection 104(c)(3)(A), to the extent permitted by law, the State assures all future operations and maintenance (O&M) of the remedial actions for the expected life of such actions. While the activities described in the SOW may not require O&M, the State recognizes that it may be responsible for O&M in any subsequent phase and commits to provide O&M following mutual selection of remedial action and identification of the necessary O&M. An application for a cooperative agreement or to amend this contract to provide for remedial design and implementation shall include the State's plan for the operation and maintenance (O&M) of the remedial action. The State's plan shall identify the agency responsible

for the O&M, the source(s) of funds for such O&M, and a description of the State's legal and financial capabilities for providing the necessary O&M of the site upon remedial implementation.

#### IX. Personnel Safety

U.S. EPA, its subcontractors or agents, shall develop and oversee the implementation of the site safety plan.

#### X. Site Access

- A. The State shall secure permission for access to the site for U.S. EPA, its contractors or agents, for the activities described in the SOW.
- B. The Project Officer, in consultation with the Project Coordinator, shall control access to the site.
- C. U.S. EPA shall not be responsible for any harm to any State representative or other person, nor shall EMS be responsible for any harm to any Federal representative or other person, arising out of or resulting from inspection, visit entry, unauthorized entry or activity on the site.

#### XI. SOW Work Products and Site Information

- A. Any information, data or analyses developed under this contract will be made available to both U.S. EPA and EMS. To the extent permitted by law, any other relevant site information available will be shared by U.S. EPA and EMS upon request. If EMS information requested by and submitted to U.S. EPA was submitted by the State under a claim of confidentiality, such information will be treated by U.S. EPA in accordance with 40 C.F.R. Part 2. Absent such a confidentiality claim by the State, U.S. EPA may make said information available to the public without further notice.
- B. U.S. EPA agrees to share information and reports developed as part of its responsibilities under this contract with the State. The State agrees not to release any written information or reports received from EPA pursuant to this contract to the public, unless approved by both U.S. EPA's Region V Office of Regional Counsel and the State Attorney General.

#### XII. Community Relations Plan

The State shall assist U.S. EPA with the development and implementation of an appropriate Community Relations Plan and assist in coordinating the activities covered by the Plan with other State and local officials.

#### XIII. Third Parties

- A. This contract is intended to benefit only the State and U.S. EPA and it extends no benefits to any third party.

- B. U.S. EPA does not assume any liability to third persons with respect to losses due to bodily injury or property damages that exceed the limitations contained in the provisions of 28 U.S.C. Sections 1346(b), 2671-2680. The State does not assume liability to any third person with respect to losses due to bodily injury or property or property damages.

#### XIV. Enforcement and Cost Recovery

- A. ~~Nothing~~ Nothing contained in the contract shall be construed to create, either expressly or by implication, a relationship of agency between U.S. EPA and the State. Any standards, procedures or protocols prescribed in this contract to be followed by U.S. EPA or its contractors during the performance of its obligations under this contract are for assurance of the quality of the final product of the actions contemplated by this contract, and do not constitute a right to control the actions of U.S. EPA. U.S. EPA (including its employees and subcontractors) is not authorized to represent or act on behalf of the State in any manner relating to the subject matter of this contract, and the State (including its employees and contractors) is not authorized to represent or act on behalf of U.S. EPA in any manner relating to the subject matter of this contract.
- B. U.S. EPA and the State agree that, with respect to the claims which each may be entitled to assert against any third persons (herein referred to as the "responsible party", whether one or more) for reimbursement of any services, materials, monies or other thing of value expended by U.S. EPA or the State for response activity at the Site described in this contract, neither U.S. EPA nor the State will enter into a settlement with or initiate a judicial or administrative proceeding against a responsible party for the recovery of such sums except after having given notice in writing to the other party to this contract not less than thirty (30) days in advance of the date of the proposed settlement or commencement of the proposed judicial or administrative proceedings. Neither party to this contract shall attempt to negotiate for or collect reimbursement of any response costs on behalf of the other party, and authority to do so is hereby expressly negated and denied.
- C. U.S. EPA and the State agree that they will cooperate in and coordinate efforts to recover their respective costs of response actions taken at the site described herein, including the negotiation of settlement and the filing and management of any judicial actions against potentially responsible parties. This shall include coordination in the use of evidence and witnesses available to each in the preparation of any cost recovery action, excepting any documents or information which may be confidential under the provisions of any applicable State or Federal law or regulation.

- D. U.S. EPA and the State agree that any judicial action taken by either party pursuant to CERCLA against a potentially responsible party for recovery of any sums expended in response actions at the site described herein shall be filed in the United States District Court for the judicial district in which the site described in the Contract is located, or in such other judicial districts of the United States District Courts as may be authorized by Section 113 of CERCLA, and agreed to in writing by the parties to this agreement.

XV. Amendments

Any changes in this contract must be agreed to, in writing, by both parties hereto.

XVI. Failure to Comply with Terms of Contract

- A. If the State fails to comply with the terms of the contract, U.S. EPA may proceed under the provisions of Section 104(d) (2) of CERCLA, after providing the EMB 60 days notice of its intended action.
- B. If U.S. EPA fails to comply with the terms of the contract, the EMB may, after providing 60 days notice, seek to enforce the contract in their appropriate court of competent jurisdiction.

XVII. Termination of the Contract

- A. The parties may enter into a termination agreement which will establish the effective date for the termination of this contract, the basis for settlement of termination costs and the amount and date of any sums due either party. Such settlement costs will include all project costs incurred, as well as any close-out costs.
- B. If at any time during the period of this contract, performance of either all or part of the work described in the SOV is voluntarily undertaken, or undertaken for any other reason by persons or entities not party to this contract, this contract will be modified or terminated as appropriate to allow these actions and, upon modification or termination, shall relieve the parties of further duties to perform those actions undertaken by persons or entities not party to this contract.
- C. This contract remains in effect until all activities described in this contract have been completed.

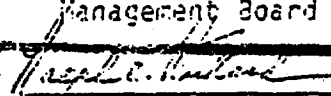


In witness whereof, the parties hereto have executed this contract in three (3) copies, each of which shall be deemed an original.

Acting Assistant Administrator,  
Office of Solid Waste and  
Emergency Response  
U.S. Environmental Protection Agency

Ralph C. Pickard  
Technical Secretary  
Indiana Environmental  
Management Board

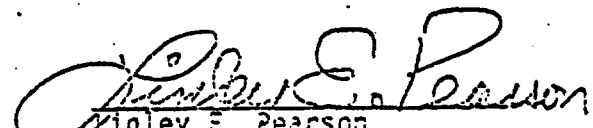




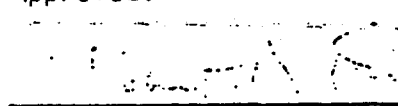
Feb 21 1983  
Date

February 24 1983  
Date

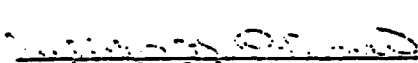
I hereby certify that the Indiana Environmental Management Board has the legal authority to enter into and fulfill the terms of this agreement.

  
Winley E. Pearson  
Indiana Attorney General

Approved:

  
Robert D. Orr,  
Governor of Indiana

Date: 2-21-83

  
Judith G. Palmer,  
Director, State Budget Agency

Date: 2-24-83

STATEMENT OF WORK

PHASE I - IRM Investigation/Feasibility Study Estimated Costs

- A. Perform a focused field investigation to obtain any additional data necessary to evaluate initial remedial measures. The initial remedial measures evaluated will address: drums, barrels, bulk tanks, on-site lagoon, and on-site ponded liquids. \$ 10,200
- B. Develop and evaluate a limited number of initial remedial alternatives including no action and off-site disposal options.

PHASE II - Remedial Investigation

Gather existing data, design safety plan, and develop sampling plans for soils, surface water/sediments, air and hydrogeologic investigations. \$220,000

PHASE III - Feasibility Study

Develop and evaluate remedial action alternatives to be taken at the site. \$ 80,000

\$310,200



# The Blackstone Hotel

Michigan Avenue at Balbo • Chicago, Illinois 60605  
Telephone: (312) 427-4300  
Telex Number 721507

TO: Our Guests

The following restaurants are highly recommended to you during your visit to The Blackstone and Chicago. You will find a wide variety on this list and many of these restaurants are within walking distance of the hotel.

It is suggested that you call for a reservation. I am certain you will enjoy the food and ambiance of all these fine dining places. If you would like a more extensive list, please call our offices.

## SURROUNDING & NEAR NORTH RESTAURANTS

- |                 |  |
|-----------------|--|
| PRINTERS ROW    | 550 W. Dearborn 461-0730<br>Continental Cuisine - Expensive-Excellent Food<br>Walking Distance - 4 Blocks  |
| BERGHOFF        | 17 W. Adams 427-3170<br>German Cuisine - Moderately Priced - Good Food<br>Walking Distance - 5 Blocks  |
| THE CART        | 601 S. Wabash 427-0700<br>Rather Expensive - Food Good - Steaks, Prime Rib<br>Walking Distance - 2 Blocks  |
| BINYONS         | 327 S. Plymouth Court 341-1155<br>Landmark Restaurant - 135 Years<br>Features Turtle Soup, Prime Rib, Fresh Fish, etc.<br>Moderately Priced - Walking Distance - 6 Blocks            |
| GREEK ISLANDS   | 766 W. Jackson Boulevard 782-9855<br>Very Authentic Greek Restaurant - Moderately Priced<br>Excellent Food - Loads of Fun - Short Cab Ride - 12 Blocks                               |
| LE BORDEAUX     | 3 W. Madison 372-2027<br>French Restaurant - Very Authentic, Moderately Priced<br>Walking Distance - 5 Blocks  |
| 8TH STREET DELI | 800 South Michigan -- very close to hotel - 939-3354<br>Delicious corned beef sandwiches (\$3.25), also pastrami,<br>open from 7:00 am. until midnight. Good for late-evening snack. |

SU CASA

49 E. Ontario Street 943-4041  
Mexican Food - Very Good And Authentic  
Short Cab Ride - Moderately priced. Mariachis

ARMANDOS

100 E. Superior 337-7672  
Artistic Atmosphere - Moderately Priced. Italian cuisine  
Good Food - Short Cab Ride

HANA EAST JAPANESE  
STEAK HOUSE

210 E. Ohio 751-2100  
Japanese Food - Very, Very Good  
Rather Expensive - Short Cab Ride

THE WATERFRONT

1110 N. Rush Street 943-7494  
Fish (live) Terrific Atmosphere - Fun - waiters provide the  
Short Cab Ride entertainment. Unique.

MILLERS PUB

23 E. Adams 922-7446  
Moderately Priced - Great Steaks  
Walking Distance - 5 Blocks - closes at 2:00 a.m. or later

ELI'S STEAK PLACE

215 E. Chicago Avenue 642-1393 (ask for Bea)  
Nice Atmosphere, Very Famous, Moderately Priced  
Short Cab Ride (try their chocolate cheese cake. Very caloric.)

ARTURO'S

1400 N. Lake Shore Drive 280-8800  
Very Romantic, Candle Light, Guitar & Violinist  
Strolling, Italian/French Cuisine, Landmark Building,  
Moderately Priced, Short Cab Ride

AVANZARE

161 E. Huron 337-8056  
Sophisticated, Northern Italian Cuisine  
Moderately Expensive, Warm & Cozy Atmosphere  
Short Cab Ride

UN GRAND CAFE

2300 Lincoln Park West 348-8886  
Sophisticated Country French, Authentic  
French Cafe, Moderately/Expensive Priced  
About 20 Minutes By Cab (quaint neighborhood)

AMBREAS

2300 Lincoln Park West 472-5959  
Award-Winning Nouvelle Cuisine, Expensive,  
With An Art Nouveau Type Atmosphere  
About 20 Minutes By Cab

Should you require any additional assistance with other restaurants,  
please call the sales and catering offices. X-7168/69/70

Natalie Vitek, Director of Sales.



DEAR GUEST:

The following list will assist you with any pertinent information you may be seeking while visiting our hotel and city. If there is any additional assistance that is not provided on this list, please check with our Superintendent of Service or Front Desk Staff.

EMERGENCY NUMBERS:

Fire Dept/Police/Ambulance  
Dental Referral Service  
Physicians Referral Service  
Pharmacy (24-hour service)  
Language Emergency  
Travelers Aid

EMERGENCY NUMBERS:  
DIAL 911  
726-4321  
922-0417  
486-0987  
332-1460  
435-4500

NEAREST HOSPITALS:

MICHAEL REESE HOSPITAL  
2920 South Ellis Avenue

791-2000  
MICHAEL REESE HOSPITAL  
2920 South Ellis Avenue

RUSH MEDICAL CENTER  
1753 West Congress

942-5000  
RUSH MEDICAL CENTER  
1753 West Congress

NORTHWESTERN HOSPITAL  
Superior & Fairbanks Court

649-2000  
NORTHWESTERN HOSPITAL  
Superior & Fairbanks Court

NEAREST GARAGE (B&W)

600 South Wabash Avenue (Valet Parking Available)  
Exclusive parking for the Blackstone Hotel.  
For rates ask Superintendent of Service.

EMERGENCY AUTOMOBILE SERVICE:

Congress Towing  
Congress & Plymouth Court

786-1735  
CONGRESS TOWING  
CONGRESS & PLYMOUTH COURT

Jame's Auto Repair  
605 S. Wabash

663-4609  
JAMES AUTO REPAIR  
605 S. WABASH

BANKING:

ILLINOIS STATE BANK  
300 South Michigan Boulevard

939-3900  
ILLINOIS STATE BANK  
300 SOUTH MICHIGAN BOULEVARD

MICHIGAN AVENUE NATIONAL BANK  
Merchandise Mart Plaza

836-8000  
MICHIGAN AVENUE NATIONAL BANK  
MERCHANDISE MART PLAZA

HAIR STYLING:

Barber Shop - Conrad Hilton Hotel  
Rebecca's Beauty Salon - Conrad Hilton Hotel  
(Located directly across the street)

AIRPORT TRANSPORTATION:

Continental (Hilton Hotel -8th Street Entrance)  
Call WA2-4400 for information.

SHOPPING:

STATE STREET MALL  
Carson Pirie Scott - State & Madison  
Sears Roebuck - State & Congress  
Marshall Field's - State & Randolph  
Montgomery Ward & Co - State & Adams  
Wieboldt Stores - State & Madison

WATER TOWER PLACE  
Marshall Fields  
Lord & Taylor  
Restaurants, etc. etc. etc.

Chicago Convention & Tourism Bureau  
Illinois Office of Tourism

225-5000  
793-4732